

1 Honorable James L. Robart
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 MICROSOFT CORPORATION, a
10 Washington corporation,

No. CV06-1116JLR

11 Plaintiff,

DECLARATION OF
12 DAVID A. BATEMAN

v.

13 JOHN DOES 1-20 d/b/a/ "Testking",

14 Defendants.

15
16 I, David Bateman, hereby declare as follows:

17 1. I am attorney of record for Microsoft in this matter. I am over the age of
18 eighteen, have personal knowledge of the matters set forth herein, and am competent to testify
19 thereto.

20 2. Attached hereto as Exhibit 1 is a true and correct copy of the <testking.com>
21 home page, which appears at the URL <http://www.testking.com>.

22 3. Attached hereto as Exhibit 2 is a true and correct copy of web page that
23 appears at the URL <http://www.testking.com/About-Us.htm>.

24 4. Attached hereto as Exhibit 3 is a true and correct copy of the first page of the
25 results of a search for the terms "Testking" and "Microsoft" using the MSN Internet search

26
DECLARATION OF
DAVID A. BATEMAN - 1
Case No. . CV06-1116JLR

K:\00103\02908\CTV\CTV_P20LX

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925 FOURTH AVENUE
SUITE 2900
SEATTLE, WASHINGTON 98104-1158
TELEPHONE: (206) 623-7580
FACSIMILE: (206) 623-7022

1 engine.

2 5. Attached hereto as Exhibit 4 is a true and correct copy of the publicly available
3 whois record for <testking.com>.

4 6. Attached hereto as Exhibit 5 are true and correct copies of the home page and
5 publicly available whois record for the domain name <123cert.com>.

6 7. Attached hereto as Exhibit 6 are true and correct copies of the home page and
7 publicly available whois record for the domain name <actual-exams.com>.

8 8. Attached hereto as Exhibit 7 are true and correct copies of the home page and
9 publicly available whois record for the domain name <braindumpcentral.com>.

10 9. Attached hereto as Exhibit 8 are true and correct copies of the home page and
11 publicly available whois record for the domain name <braindumps.com>.

12 10. Attached hereto as Exhibit 9 are true and correct copies of the home page and
13 publicly available whois record for the domain name <braindumps.net>.

14 11. Attached hereto as Exhibit 10 are true and correct copies of the home page and
15 publicly available whois record for the domain name <braindumps-central.com>.

16 12. Attached hereto as Exhibit 11 are true and correct copies of the home page and
17 publicly available whois record for the domain name <braindumpsinfo.com>.

18 13. Attached hereto as Exhibit 12 are true and correct copies of the home page and
19 publicly available whois record for the domain name <braindumpsmail.com>.

20 14. Attached hereto as Exhibit 13 are true and correct copies of the home page and
21 publicly available whois record for the domain name <braindumps-tutorial.com>.

22 15. Attached hereto as Exhibit 14 are true and correct copies of the home page and
23 publicly available whois record for the domain name <certguide.com>.

24 16. Attached hereto as Exhibit 15 are true and correct copies of the home page and
25 publicly available whois record for the domain name <certheaven.com>.

26
DECLARATION OF
DAVID A. BATEMAN - 2
Case No. . CV06-1116JLR

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1 17. Attached hereto as Exhibit 16 are true and correct copies of the home page and
2 publicly available whois record for the domain name <certhq.com>.

3 18. Attached hereto as Exhibit 17 are true and correct copies of the home page and
4 publicly available whois record for the domain name <certification-offer.com>.

5 19. Attached hereto as Exhibit 18 are true and correct copies of the home page and
6 publicly available whois record for the domain name <certification-online-program.com>.

7 20. Attached hereto as Exhibit 19 are true and correct copies of the home page and
8 publicly available whois record for the domain name <certification-paper.com>.

9 21. Attached hereto as Exhibit 20 are true and correct copies of the home page and
10 publicly available whois record for the domain name <certification-portal.com>.

11 22. Attached hereto as Exhibit 21 are true and correct copies of the home page and
12 publicly available whois record for the domain name <certifyexpress.com>.

13 23. Attached hereto as Exhibit 22 are true and correct copies of the home page and
14 publicly available whois record for the domain name <certifyyourself.com>.

15 24. Attached hereto as Exhibit 23 are true and correct copies of the home page and
16 publicly available whois record for the domain name <cram4exams.com>.

17 25. Attached hereto as Exhibit 24 are true and correct copies of the home page and
18 publicly available whois record for the domain name <exact-exams.com>.

19 26. Attached hereto as Exhibit 25 are true and correct copies of the home page and
20 publicly available whois record for the domain name <exactquestions.com>.

21 27. Attached hereto as Exhibit 26 are true and correct copies of the home page and
22 publicly available whois record for the domain name <mcsebraindumps.com>.

23 28. Attached hereto as Exhibit 27 are true and correct copies of the home page and
24 publicly available whois record for the domain name <mcseguide.com>.

25 29. Attached hereto as Exhibit 28 are true and correct copies of the home page and
26

DECLARATION OF
DAVID A. BATEMAN - 3
Case No. . CV06-1116JLR

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1 publicly available whois record for the domain name <microsoft-braindumps.com>.

2 30. Attached hereto as Exhibit 29 are true and correct copies of the home page and
3 publicly available whois record for the domain name <microsoft-training-exam.com>.

4 31. Attached hereto as Exhibit 30 are true and correct copies of the home page and
5 publicly available whois record for the domain name <perfect-braindumps.com>.

6 32. Attached hereto as Exhibit 31 are true and correct copies of the home page and
7 publicly available whois record for the domain name <questions-central.com>.

8 33. Attached hereto as Exhibit 32 are true and correct copies of the home page and
9 publicly available whois record for the domain name <real-exams.com>.

10 34. Attached hereto as Exhibit 33 are true and correct copies of the home page and
11 publicly available whois record for the domain name <studyguide-testking.com>.

12 35. Attached hereto as Exhibit 34 are true and correct copies of the home page and
13 publicly available whois record for the domain name <training-test-paper.com>.

14 I declare under penalty of perjury that the foregoing is true and correct:

15 EXECUTED this 15th day of August, 2006 at Seattle, WA.



16
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18 David A. Bateman
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DECLARATION OF
DAVID A. BATEMAN - 4
Case No. . CV06-1116JLR

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McAfee	Microsoft										
McData											
Microsoft											
Mile2											
Network Appliance											
Network General											
Nokia											
Nortel											
Novell											
OMG											
Oracle											
PMI											
Polycom											
RedHat											
SAIR											
SAS Institute											
SCP											
SeeBeyond											
SNTA											
Sun											
Sybase											
Symantec											
Teradata											
TIA											
Tibco											

TruSecure	13	VPN and Security	Citrix	Available	MB7-231	MB7-232
Veritas					70-293	MB2-184
VMware		Rank	Cert Name	Value	MB2-185	MB2-228
 SAMPLES	1	CCEA 4.0		Pack	MB3-208	MB3-215
	2	CCA 4.0		Available	MB3-234	MB3-461
 FAQ	3	CCIA - Citrix Certified Integration Architect		Available	MB3-462	MB3-465
	4	CCA 3.0 - Citrix Certified Administrator 3.0		Available	MB5-198	MB5-199
			CompTIA	Available	MB5-229	MB5-292
				Available	MB6-282	MB6-283
				Available	MB6-284	MB6-285
				Value	MB6-288	
 GUARANTEE	Rank	Cert Name		Pack	Nortel	
	1	A+		Available	920-161	
 TESTIMONIALS	2	Network+		Value	OMG	
	3	Security+		Available	UM0-200	
 RESELLER			EMC	Available	Oracle	
 NEW REFERRALS	Rank	Cert Name		Value	1Z0-001	1Z0-007
	1	Technology Foundations		Pack	1Z0-024	1Z0-025
 MOST POPULAR	Rank	Cert Name		Value	1Z0-030	1Z0-030
 HOT PRODUCTS	1	ITEL	HP	Pack	1Z0-101	1Z0-131
 Checkpoint	Rank	Cert Name		Available	1Z0-132	1Z0-140
 Cisco	350-001	350-018	ASE - Accredited Systems Engineer	Value	1Z0-147	
	350-030	640-801	2 AIS - Accredited Integration Specialist	Pack	SAS Institute	
	640-811	640-821	IBM	Available	A00-206	
	640-861	642-425		Available	Sun	
	642-432	642-444		Value	310-330	310-600
	642-502	642-522	1 Certified Specialist	Pack	310-615	310-875
	642-532	642-551	2 Certified Advanced Technical Expert	Available	310-878	310-879
	642-582	642-642	3 Systems Expert	Value	310-879	
	642-801	642-821		Pack	CCSE	CCSA
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 Citrix	1Y0-256	1Y0-306	1 CISSP	Value	CCNA	CCIP
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 Exin	EX0-100			Value	Citrix	
 HP	1	JNCIA	Cert Name	Pack	CCEA XP	
				Available	CompTIA	
				Value	Security+	
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1	6.5 CNE	Available
	Oracle	
Rank	Cert Name	Value Pack
1	9i DBA - 9i Database Administrator	Available
2	10g DBA - 10g Database Administrator	Available
	Special	
Rank	Cert Name	Value Pack
1	Special	Available
	Sun	
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1	Solaris 10 SCSA	Available
	VMware	
Rank	Cert Name	Value Pack
1	VCP - VMware Certified Professional	Available

Rank	Cert Name	Value Pack
1	Special	Available
	Sun	
Rank	Cert Name	Value Pack
1	Solaris 10 SCSA	Available
	VMware	
Rank	Cert Name	Value Pack
1	VCP - VMware Certified Professional	Available

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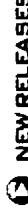
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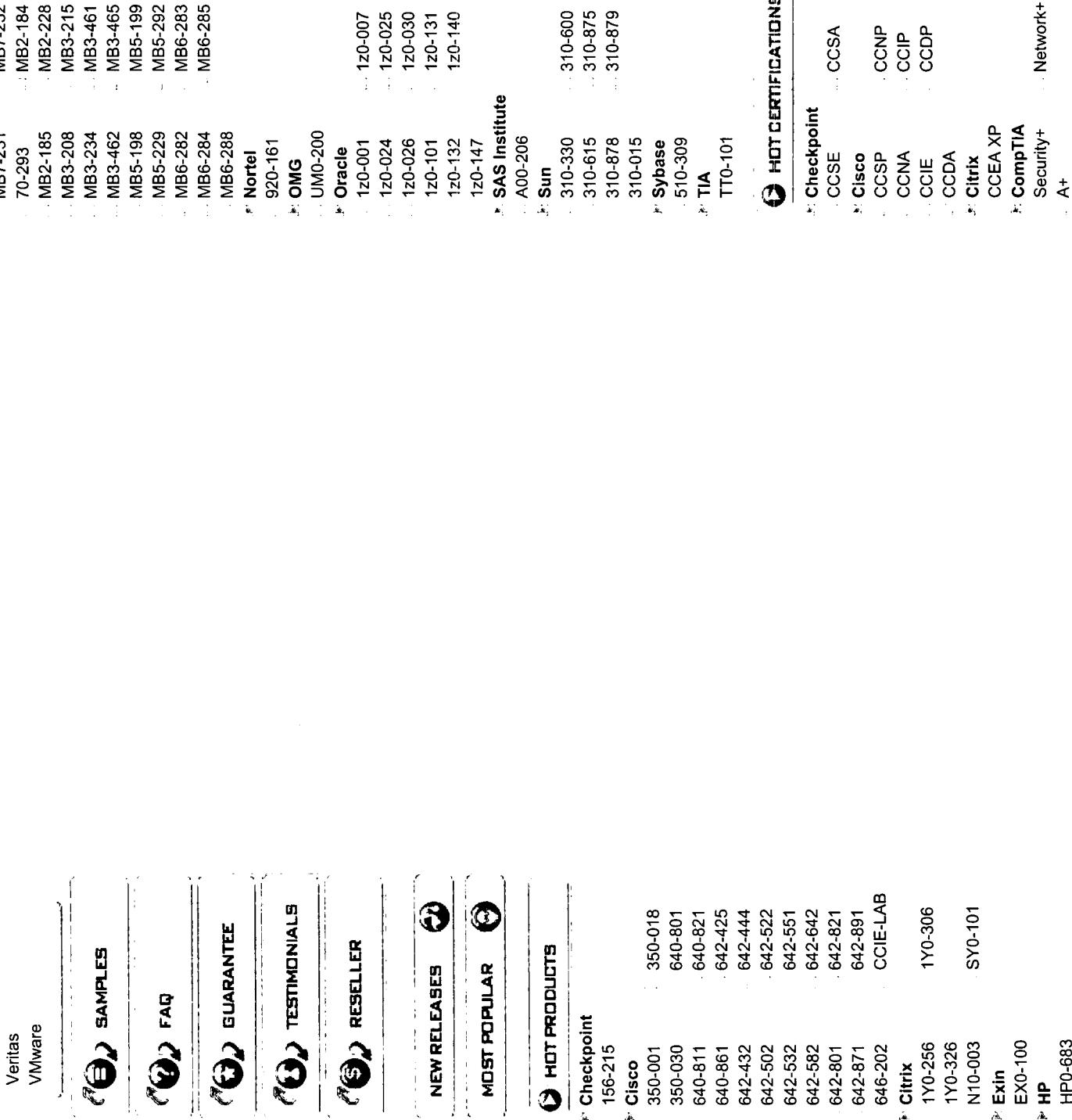
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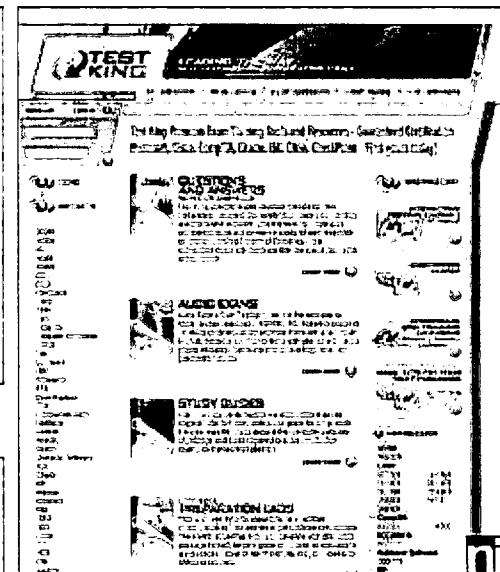
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Meta Keywords:	MCSE, MCSE Training, CCNA Certification, CCNA Training, CCNA, MCSE Certification, A+ Certification, Netowrk+ Training, Network+ Certification, CISSP, CISSP Training, CISSP Certification, Network+ Certification.

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DMOZ Description:	IT training study guides and course tests for Microsoft, CIW, Cisco, and others.
Alexa Related:	10 listings
Sites:	a1pctraining.com , seniortechllc.com , real-exams.com , mcsebraindumps.com , funwithxp.com , exactquestions.com , certyourself.com , certifyexpress.com , actual-exams.com , tripod.com ,
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Domain History

We have recorded 260 Whois changes for testking.com since 2003-05-31. View them with our [Domain History](#) tool.

Server Data

Server Type:	Microsoft-IIS/5.0
IP Address:	64.106.243.104    
IP Location:	 - New Jersey - Edgewater - Datapipe
Response Code:	200
Blacklist Status:	Clear (history)

Watch this domain for changes using our [Monitor Tool](#).

Backorder

[Set a backorder](#) so you can own testking.com when it becomes available.

SSL Cert: No valid SSL on this Host**Website Status:** Active**Registry Data****ICANN Registrar:** ENOM, INC.**Created:** 05-Dec-2001**Expires:** 05-Dec-2006**Registrar Status:** REGISTRAR-LOCK**Whois Server:** whois.enom.com**Name Server:** DNS1.NAME-SERVICES.COM**Whois History:** 260 records have been archived**Whois Record**

=====

Domain name: testking.com

Registrant Contact:

Whois Privacy Protection Service, Inc.
 Whois Agent (blnrotseck@whoisprivacyprotect.com)
 +1.4252740657
 Fax: +1.4256960234
 PMB 368, 14150 NE 20th St - F1
 C/O testking.com
 Bellevue, WA 98007
 US

Administrative Contact:

Whois Privacy Protection Service, Inc.
 Whois Agent (blnrotseck@whoisprivacyprotect.com)
 +1.4252740657
 Fax: +1.4256960234
 PMB 368, 14150 NE 20th St - F1
 C/O testking.com
 Bellevue, WA 98007
 US

Technical Contact:

Whois Privacy Protection Service, Inc.
 Whois Agent (blnrotseck@whoisprivacyprotect.com)
 +1.4252740657
 Fax: +1.4256960234
 PMB 368, 14150 NE 20th St - F1
 C/O testking.com
 Bellevue, WA 98007
 US

Status: Locked

Name Servers:

dns1.name-services.com
 dns2.name-services.com
 dns3.name-services.com
 dns4.name-services.com
 dns5.name-services.com

Creation date: 05 Dec 2001 12:25:59

Expiration date: 05 Dec 2006 12:25:59

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Domain	Price
AsiaKing.com	\$100.00
KingDons.com	\$150.00
EmailKing.com	\$395.00
PageKing.com	\$488.00
TeamKing.com	\$488.00
ZeroKing.com	\$488.00
CafeKing.com	\$500.00
HotKing.com	\$500.00
KingMusic.com	\$525.00
KingU.com	\$600.00
WorkKing.com	\$1,000.00

Domains At Auction

Domain	Auction Date
Yo-King.net	06-29-2006
BossBass.com	06-30-2006
BossRemover.com	06-30-2006
KingTable.com	06-30-2006
TheSuperKing.com	06-30-2006
GoodhartKing.com	06-30-2006
CarWaxKing.com	06-30-2006
CollegeKingRex.com	06-30-2006
NavyChief.net	06-30-2006
NetworkChief.net	06-30-2006
KingJimmysAllStars.com	06-30-2006
King-Ralph.com	06-30-2006
ReelKingZ.com	06-30-2006

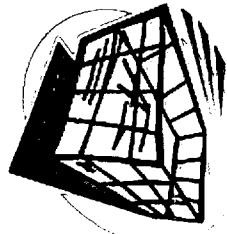


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CIW	Huawei	OMG	
	Hyperion	Oracle	

Whois History: 5 records have been archived**Whois Record**

=====

Registration Service Provided By: Certification Trendz
 Contact: admin@testmatrix.net

Domain name: 123cert.com

Registrant Contact:

—
 Ove Lundberg (admin@testmatrix.net)
 706267479
 Fax: none
 Sernanders vag 9:516
 Uppsala, 75262
 SE

Administrative Contact:

Ruthy
 Ruthy George (webmaster@braindumps.net)
 +1.9783378048
 Fax:
 53 Third Avenue
 Burlington, MA 01803
 US

Technical Contact:

Ruthy
 Ruthy George (webmaster@braindumps.net)
 +1.9783378048
 Fax:
 53 Third Avenue
 Burlington, MA 01803
 US

Status: Locked

Name Servers:

dns1.name-services.com
dns2.name-services.com
dns3.name-services.com
dns4.name-services.com
dns5.name-services.com

Creation date: 09 Jan 2002 07:56:08

Expiration date: 09 Jan 2007 07:56:08

=====

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Domain	Price
CheatCert.com	\$90.00
CertOn.com	\$500.00
CertHelp.com	\$500.00
CertLab.com	\$500.00
CertTrack.com	\$500.00
CertSecurity.com	\$500.00
TrustCert.com	\$910.00
IntraCert.com	\$990.00
CyberCert.com	\$1,230.00
CertSource.com	\$1,230.00
SageCert.com	\$1,390.00

Domains At Auction

Domain	Auction Date
KentCountyCertTeam.com	06-24-2006
CertifiedAudio.com	06-25-2006
CertifiedGuru.com	06-25-2006
GifCert.com	06-25-2006
NotCertifiedOrganic.net	06-25-2006
CertifiedAsap.com	06-25-2006
TheCert.com	06-26-2006
CertUsaSia.com	06-26-2006
CertUsCayman.com	06-26-2006
CertUsbVi.com	06-26-2006
UpNpCertified.com	06-26-2006



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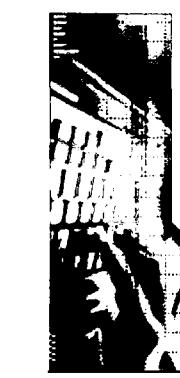
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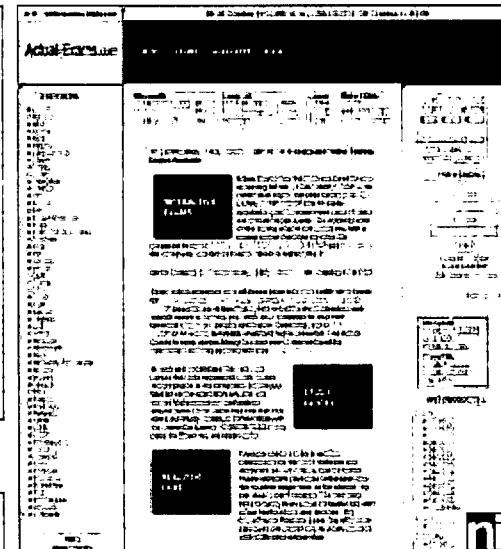
Website Title: 500 read timeout

Record Type: Domain Name

Meta Description: MCSE Training, A+ Certification, CCNA, CISSP, CCNP Training, CCIE LAB Description: CCNA, A+ Certification, MCSE, CCNA Training and Certification Materials and many more.

Meta Keywords: Mcse, ccna, A+ Certification, MCSE Training, CCNA Certification, CCIE LAB, CCIE Training, CCIE Certification, MCSE Certification, CISSP, CCNP Training, CCNP Certification, CISSP Training, CISSP Certification, CCIE LAB Training.

Thumbnail: 2006-06-15



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Alexa Trend/Rank: ↗ 496,222 (1 Month) 350,761 (3 Month)

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Server Data

IP Address: 64.106.243.100

IP Location: - New Jersey - Edgewater - Datapipe

Response Code: 500

Blacklist Status: Clear ([history](#))

SSL Cert: No valid SSL on this Host

Website Status: Active

Domain History

We have recorded 30 Whois changes for actual-exams.com since 2003-04-02. View them with our [Domain History](#) tool.

Monitor

Watch this domain for changes using our [Monitor Tool](#).

Backorder

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Registry Data

ICANN Registrar: ENOM, INC.

Created: 18-Aug-2002

Expires: 18-Aug-2006

Registrar Status: REGISTRAR-LOCK

Whois Server: whois.enom.com**Name Server:** DNS5.NAME-SERVICES.COM**Whois History:** 30 records have been archived**Whois Record**

=====

Domain name: actual-exams.com

Registrant Contact:

Whois Privacy Protection Service, Inc.
 Whois Agent (tdqxxwqkmdy@whoisprivacyprotect.com)
 +1.4252740657
 Fax: +1.4256960234
 PMB 368, 14150 NE 20th St - F1
 C/O actual-exams.com
 Bellevue, WA 98007
 US

Administrative Contact:

Whois Privacy Protection Service, Inc.
 Whois Agent (tdqxxwqkmdy@whoisprivacyprotect.com)
 +1.4252740657
 Fax: +1.4256960234
 PMB 368, 14150 NE 20th St - F1
 C/O actual-exams.com
 Bellevue, WA 98007
 US

Technical Contact:

Whois Privacy Protection Service, Inc.
 Whois Agent (tdqxxwqkmdy@whoisprivacyprotect.com)
 +1.4252740657
 Fax: +1.4256960234
 PMB 368, 14150 NE 20th St - F1
 C/O actual-exams.com
 Bellevue, WA 98007
 US

Status: Locked

Name Servers:

dns1.name-services.com
 dns2.name-services.com
 dns3.name-services.com
 dns4.name-services.com
 dns5.name-services.com

Creation date: 18 Aug 2002 16:42:50

Expiration date: 18 Aug 2006 16:42:50

=====

Domains for Sale

Domain	Price
FrenchExams.com	\$500.00
RectalExams.com	\$500.00
AudioExams.com	\$500.00
JobExams.com	\$548.00
MyExams.com	\$548.00
MockExams.com	\$800.00
TakingExams.com	\$850.00
AccountingExams.com	\$999.00
ExamsAsap.com	\$1,000.00
ExamsGuru.com	\$1,000.00
EssayExams.com	\$1,100.00

Domains At Auction

Domain	Auction Date
Talking-Exams.com	06-25-2006
ExamsExpress.com	06-26-2006
Mock-Exams.net	06-26-2006
Physical-Exams.com	06-26-2006
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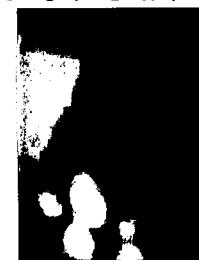
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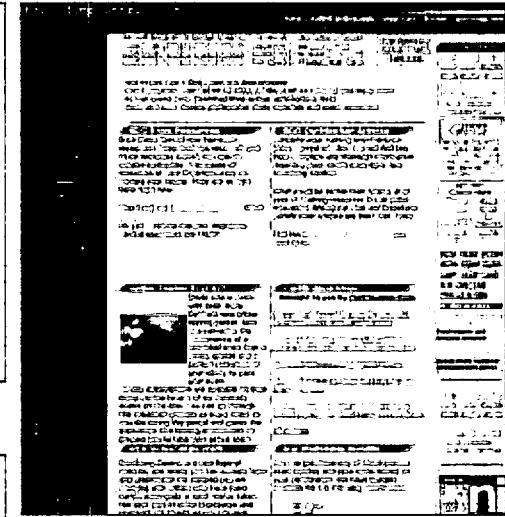
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Alexa Trend/Rank:	696,601 (1 Month) 414,751 (3 Month)

Server Data

Server Type:	Microsoft-IIS/5.0
IP Address:	209.40.126.225
IP Location:	- District Of Columbia - Washington - Hopone Internet Corporation
Response Code:	200
Blacklist Status:	Clear (history)
SSL Cert:	No valid SSL on this Host
Website Status:	Active
Reverse IP:	50 other sites hosted on this server

Thumbnail: 2005-11-07

Queue Thumbnail For Update

Other TLDs[Show Key](#)

.com	.net	.org	.info	.biz	.us
Ra	Ra	Ra	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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There are 50 other sites hosted on this webserver. View a sample with [Reverse IP](#).

Registry Data

ICANN Registrar: ENOM, INC.
Created: 09-Apr-2001
Expires: 09-Apr-2010
Registrar Status: REGISTRAR-LOCK
Whois Server: whois.enom.com
Name Server: DNS5.NAME-SERVICES.COM
Whois History: 14 records have been archived

Whois Record

=====

Registration Service Provided By: Certification Trendz
 Contact: admin@testmatrix.net

Domain name: braindumpcentral.com

Registrant Contact:

Ove Lundberg (admin@testmatrix.net)
 706267479
 Fax: none
 Sernanders vag 9:516
 Uppsala, 75262
 SE

Administrative Contact:

NA
 Braindump Central (info@braindumpcentral.com)
 +91.5555555555
 Fax:
 877, Adarsh Nagar
 Oshiwara, MR 50310
 IN

Technical Contact:

NA
 Braindump Central (info@braindumpcentral.com)
 +91.5555555555
 Fax:
 877, Adarsh Nagar
 Oshiwara, MR 50310
 IN

Status: Locked

Name Servers:

dns1.name-services.com
dns2.name-services.com
dns3.name-services.com
dns4.name-services.com
dns5.name-services.com

Creation date: 09 Apr 2001 14:49:40
 Expiration date: 09 Apr 2010 14:49:40

=====

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Domains for Sale

Domain	Price
FtpDump.com	\$75.00
DumpDolls.com	\$105.00
DumpKins.com	\$110.00
WasteDump.com	\$500.00
SpaceDump.com	\$500.00
Dump.info	\$628.00
DumpI.com	\$753.00
ArticulatedDump.com	\$999.00
TownDump.com	\$1,000.00
DumpDomains.com	\$1,255.00
DataDump.com	\$1,888.00

Domains At Auction

Domain	Auction Date
DumpTheFat.com	06-25-2006
DropWeightNow.com	06-26-2006
TossSkateboard.com	06-26-2006
TheDropFood.com	06-26-2006
TossBoardShop.com	06-26-2006
InformDropMore.com	06-26-2006
TheDropMeals.com	06-26-2006
TossRideShop.com	06-26-2006
TheDropDelivery.com	06-26-2006
DropTheMind.com	06-26-2006
StateOfFloridaDrop.com	06-26-2006
DateOrDump.net	06-26-2006





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    MCSA --> Aplus
    Aplus --> Network[Network+]
    Network --> CCNA[CCNA]
    Network --> CISSP[CISSP]
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    CISSP --> Tools
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